

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No. 8:15-CR-355 (LEK)
)	
v.)	Indictment
)	
)	Violation(s): 18 U.S.C. §§ 1956(a)(2)(A)
)	And 1956(h)
STEVENS LAINCY a/k/a "George Peterson,")	Conspiracy to Commit Money
JAMIE MCCAULEY-FOY a/k/a)	Laundering
"Jessyka," and)	
CARLOS BRENES,)	1 Count & Forfeiture Allegation
)	
Defendants.)	County of Offense: Clinton

THE GRAND JURY CHARGES:

COUNT 1

[Conspiracy to Commit Money Laundering]

Between in or about 2006 and in or about December, 2010, in Clinton County in the Northern District of New York, and elsewhere, the defendants,

STEVENS LAINCY a/k/a "George Peterson,"
JAMIE MCCAULEY-FOY a/k/a "Jessyka," and
CARLOS BRENES

and others conspired to commit international money laundering, by transporting, transmitting, and transferring, and attempting to transport, transmit and transfer, one or more monetary instruments and funds from one or more places in the United States to and through one or more places outside the United States with the intent to promote the carrying on of specified unlawful activity, that is a business enterprise involving prostitution, in violation of the laws of the State of New York, in violation of Title 18, United States Code, Sections 1956(a)(2)(A).

FORFEITURE ALLEGATION

1. The allegations contained Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1956 set forth in Count One of this Indictment, the defendants,

**STEVENS LAINCY a/k/a "George Peterson,"
JAMIE MCCAULEY-FOY a/k/a "Jessyka," and
CARLOS BRENES**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(A), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT

A) A money judgment in the amount of no less than \$2,900,000.00 in U.S. Currency.

1. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c).

Dated: December 16, 2015

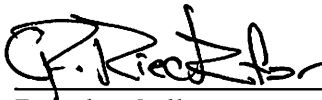
A TRUE BILL,

*name redacted

Grand Jury Foreperson

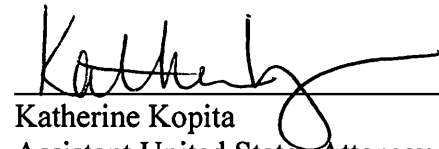
RICHARD S. HARTUNIAN
United States Attorney

By:



Douglas Collyer
Assistant United States Attorney
Bar Roll No. 519096

By:



Katherine Kopita
Assistant United States Attorney
Bar Roll No. 517944